

* * * LISTING OF HANDLER IDENTIFICATION DATA * * *

Handler Name / ID / Address	S O N P	Regulated Activities
U S A T C	F	SG
MO2210090088 4300 GOODFELLOW BLVD, ST LOUIS		
Low Income and Minority Score:		Source:
Mail Address: 4300 GOODFELLOW BLVD		
ATTN: SATAI-A		
ST LOUIS	MO	631201798
NOTIF RECEIPT: 09/01/92 CMNTS:		
NOTIF CONTACT: H J MOGLIA		
(L) 4300 GOODFELLOW BLVD		
ATTN: SATAI-A		
ST LOUIS	MO	631201798
PHONE:		
Current Owner: GENERAL SERVICES ADMIN		
Address: NA		
NA	MO	NA
* * * * *	E N D O F	R E P O R T * * * * *



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U S A T C

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January 5, 1998

Mr. John Beard
Missouri Department of Natural Resources
P. O. Box 176
Jefferson City, MO 65102-0176

RE: Quality Assurance of RCRIS Generators

Dear Mr. Beard:

As we have discussed, there are significant differences in generator status for Missouri facilities in the following three databases: RCRIS, BRS'95, and Missouri's state database. Near the end of October, Mary Williams of your staff, sent us a printout showing the differences, and asking for our recommendations on cleaning up the data errors. As you know, we have encountered similar challenges in the past with regard to maintaining accurate data for Iowa, and we would like to share with you some of our strategies and lessons-learned for improving your data quality.

First of all, it is important to understand that the three databases in which you track Missouri facilities' generator status (namely, RCRIS, BRS and your own state database) are not in any way inter-related. Each contains information that is duplicative of information in the other two. A disadvantage of tracking the same pieces of data in more than one system is that they seldom agree. Absent adequate and appropriate procedures, reconciliation can be an on-going problem.

RCRIS is a real-time dynamic system that attempts to track at any given point in time which sites are engaging in which class of hazardous waste generation, or other RCRA regulated activity, such as transportation of hazardous waste. BRS, on the other hand, is a snapshot of the Large Quantity Generators (LQGs) and Treatment/Storage/Disposal (TSD) facilities for each odd-numbered calendar year. Thus, the exact number of LQGs in RCRIS and BRS will probably never be exactly the same. However, the current discrepancy of over eight hundred LQGs in RCRIS and only about two hundred LQGs in BRS'95 is a sizeable enough variance to be indicative of a significant data quality problem which has probably developed over several years.

Like any large complex task, this data clean up effort can probably be best accomplished by phasing it into several subtasks. For example, begin with LQGs, then move to SQGs. Once the data quality project has been completed, careful adherence to procedures should prevent the data from becoming so corrupt again.

If, for example, a company notifies you that they were generating hazardous waste but have ceased, you must enter this information in both RCRIS and your state data system, in order for both systems to accurately reflect reality. In RCRIS, this information would be appropriately entered into the Handler Module under the N (for Notification) source.

Alternatively, if a state inspector visits a site and determines that their generator status is other than what is recorded in RCRIS and/or the state system, you must enter this information (into the handler module of RCRIS) in order for RCRIS to be updated. This information would be appropriately entered under the S (for State) source. Given MDNR's organizational structure, this probably means that you need to establish forms and procedures by which your field inspectors can record and provide this information to you and Mary for entry into the Handler Module. Merely appearing in the inspection report, or on the compliance/enforcement data entry form will not result in the RCRIS generator status being updated unless you take some positive step to ensure that it is done.

All data in RCRIS should always be supported by a document, or documents, in the facility file which explains and supports the change. This may be a form, a letter from the company, or a notification form. The date of each change to Handler Data in RCRIS, whether S-source or N-source, should correlate to a document date in the facility file. We also recommend that you consider using the secondary ID number field of RCRIS to hold your state ID number so that you can easily cross-reference facilities from one database to another.

Two tools that may be helpful to you in beginning this effort are the enclosed post-cards which were returned to us as undeliverable by the postal service, and RCRIS-INFO. Last summer, as part of the announcement of an environmental conference in Kansas City, post-cards were mailed to all facilities in the RCRIS database. The attached are those which were returned to us as undeliverable. It is likely that these companies have gone out of business or have moved to another location (for which they must obtain a new/different ID number).

See EXAMPLE A (enclosed): MOD985792118 is listed in RCRIS (per the RCRIS-INFO handler report) as belonging to Smith and Nephew, at 1920 South Jefferson in St. Louis. The company is listed as being a Small Quantity Generator, however, their mail was returned as undeliverable. We recommend that you make phone calls to determine if this company is still operating at this location, or if they moved and are operating at another location, or some other scenario has taken place. Perhaps your field office can be of assistance, performing a drive-by visit. The information obtained should be documented for the file, and RCRIS should be updated accordingly.

You may wish to refer back to your RCRIS Orientation Training manual which we provided at the 8-hour training course in Jefferson City in 1996 for additional information. If it would be helpful to you to work through several examples, Mr. Perce Cox is available to travel to Jefferson City for two to three days in January to work with you one-on-one on establishing and implementing procedures that will result in better quality data.

It is important to keep RCRIS data as accurate as possible. There are a wide variety of customers of RCRIS who use it for many purposes. Among other things, this data is used as a basis to respond to Freedom of Information Act Requests and Congressional inquiries, to apportion resources and state grants, and to measure progress and results. In addition, this information is routinely available to the general public via the Internet, and is represented as being accurate. We strongly encourage you to take active steps to improve the quality of your data this fiscal year. Please call Perce at (913) 551-7126 to set up dates for his travel to Jefferson City, should you wish to accept our offer of assistance. If you have any questions, please do not hesitate to contact me at (913) 551-7730.

Sincerely,

Harriett L. Jones, P.E.
Region 7 RCRIS Project Officer
Iowa RCRA and State Programs Branch
Air, RCRA, and Toxics Division

Enclosures